

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

GERALD W. CORDER,

Plaintiff,

v.

**ANTERO RESOURCES CORPORATION,
a Delaware corporation,**

Defendant.

**Civil Action No. 1:18-CV-30
Hon. Judge Irene M. Keeley**

c/w 1:18CV31, 1:18CV32,
1:18CV33, 1:18CV34, 1:18CV35,
1:18CV36, 1:18CV37, 1:18CV38,
1:18CV39, 1:18CV40 for purposes of
discovery and setting schedule

DECLARATION OF ALVYN A. SCHOPP

Pursuant to 28 U.S.C. § 1746, Alvyn A. Schopp declares as follows:

1. I am Regional Senior Vice President and Chief Administrative Officer for Antero Resources Corporation (“Antero”).
2. I have assisted in formulating and obtaining information for Antero’s initial disclosures and responses to Plaintiffs’ discovery requests in this action.
3. Antero produced true, accurate, and correct copies of 51 gathering and compression agreements and amendments thereto kept in the regular course of business as Bates-stamped AGC-008852 to AGC-009876.
4. Antero produced true, accurate, and correct copies of 30 processing agreements and amendments thereto kept in the regular course of business as Bates-stamped AGC-002265 to AGC-002862.
5. Antero produced true, accurate, and correct copies of 119 transportation agreements and amendments thereto kept in the regular course of business as Bates-stamped AGC-001222 to AGC-002260.

6. Pursuant to Federal Rule of Evidence 1006, a summary of these agreements and amendments is attached as “Exhibit 1” due to their voluminous nature.

7. These agreements and amendments set forth the terms and conditions associated with post-production processes for Antero’s West Virginia gas operations relevant to the leases at issue in this action.

8. Antero also produced true, accurate, and correct copies of 56 statements and invoices for gathering and compression costs for sample months November 2014 and November 2017 kept in the regular course of business as Bates-stamped AGC-009877A to AGC-010081A.

9. Antero produced true, accurate, and correct copies of 100 statements and invoices for processing costs for sample months November 2014 and November 2017 kept in the regular course of business as Bates-stamped AGC-010082A to AGC-010347A.

10. Antero produced true, accurate, and correct copies of 31 statements and invoices for transportation costs for sample months November 2014 and November 2017 kept in the regular course of business as Bates-stamped AGC-010350A to AGC-010503A.

11. Pursuant to Federal Rule of Evidence 1006, a summary of these statements and invoices is attached as “Exhibit 2” due to their voluminous nature.

12. These statements and invoices provide supporting documentation for post-production expenses incurred for two sample months.

13. These documents collectively demonstrate the fact that Plaintiffs’ deductions were actually incurred and reasonable. Furthermore, Plaintiffs’ deductions are directly related to the agreements, amendments, statements, and invoices described above.

14. Antero also produced voluminous royalty accounting data for each Plaintiff kept in the regular course of business in Excel format as Bates-stamped ACG-012735 to ACG-012746.¹

15. This royalty accounting data is current through production month August 2020 and accounting month October 2020.

16. Pursuant to Federal Rule of Evidence 1006, a summary of the royalty accounting data is attached as “Exhibit 3” due to its voluminous nature.

17. This summary is limited to Plaintiffs’ interests in leases at issue in this action.

18. This summary calculates over-refunds for all deductions for each Plaintiff.

19. This summary calculates total deductions for each lease by type (i.e., COM3, PRC2, and TRN3).²

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 15, 2021.



Alwyn A. Schopp
Regional Senior Vice President
Antero Resources Corporation

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¹ Antero previously produced voluminous royalty accounting data for each Plaintiff in Excel format on January 20, 2019; however, such documents were not Bates-stamped. Antero also produced numerous royalty summary charts throughout the course of discovery as Bates-stamped AGC-000754 to AGC-000755; AGC-000806 to AGC-000807; AGC-000808; AGC-000810; AGC-001057A to AGC-001059A; and AGC-012731 to AGC-012734.

² See ECF No. 75 (dismissing with prejudice the Settling Plaintiffs’ breach of contract claims on the leases attached to the second amended complaints as Exhibits 2–8 that arose before the Settlement Agreement was signed).

**SUMMARY OF AGREEMENTS AND AMENDMENTS
PURSUANT TO FEDERAL RULE OF EVIDENCE 1006**

No.	Description	Bates
1.	Gathering and compression agreements and amendments	AGC-008852 to AGC-009876
2.	Processing agreements and amendments	AGC-002265 to AGC-002862
3.	Transportation agreements and amendments	AGC-001222 to AGC-002260

**SUMMARY OF STATEMENTS AND INVOICES
PURSUANT TO FEDERAL RULE OF EVIDENCE 1006**

No.	Description	Bates
1.	Statements and invoices for gathering and compression costs for sample months November 2014 and November 2017	AGC-009877A to AGC-010081A
2.	Statements and invoices for processing costs for sample months November 2014 and November 2017	AGC-010082A to AGC-010347A
3.	Statements and invoices for transportation costs for sample months November 2014 and November 2017	AGC-010350A to AGC-010503A

**SUMMARY OF ROYALTY ACCOUNTING DATA
PURSUANT TO FEDERAL RULE OF EVIDENCE 1006**

A. OVER-REFUNDS FROM AUGUST 2015 SETTLEMENT

Name	Over-refunds¹
Janet Packard	(\$3,642.99)
Garnet Cottrill	(\$3,641.52)
Marlyn Sigmon	(\$3,641.52)
Randall Corder	(\$3,642.99)
Lorena Krafft	(\$728.60)
Cheryl Morris	(\$728.60)
Tracy Bridge	(\$728.60)
Gerald Corder	(\$3,642.99)
Angela Nicholson	(\$242.89)
Kevin McCall	(\$242.89)
Brian McCall	(\$242.81)
GRAND TOTAL	(\$21,126.40)

**B. NON-SETTLING PLAINTIFFS' DEDUCTS BY LEASE
(through October 2020 accounting)**

Name	Lease Bk/Pg	Lease Ex.	COM3	PRC2	TRN3	Total
Janet Packard	1499/147	2	\$46.85	\$630.36	\$65.70	\$742.91
Garnet Cottrill	1496/1203					
Marlyn Sigmon	1498/865					
	1080/677	3	\$1,694.72	\$19,871.21	—	\$21,565.93
	1082/656	4	\$786.50	\$9,570.50	—	\$10,357.00
	1103/733	5	—	—	—	\$0.00
	1084/203	6	\$19.37	\$573.22	\$294.41	\$887.00
	1084/197	7	\$23.37	\$980.27	\$610.22	\$1,613.86
	99/7	8	\$0.39	\$4.69	—	\$5.08
	143/291 ²	9	—	\$1.70	\$1.72	\$3.42
		GRAND TOTAL:	\$2,571.20	\$31,631.95	\$972.05	\$35,175.20

¹ For all deduction types, including WV_SEV and WV_SEV1.

² Janet Packard does not have an interest in this lease.

**C. SETTLING PLAINTIFFS' DEDUCTS BY LEASE AFTER SETTLEMENT
(through October 2020 accounting)**

Name	Lease Bk/Pg	Lease Ex.	COM3	PRC2	TRN3	Total
Randall Corder	1562/1128	2	—	\$69.49	\$73.60	\$143.09
Lorena Krafft	1562/1120					
Cheryl Morris	1562/1114					
Tracy Bridge	1562/1126					
Gerald Corder	1562/1110					
Angela Nicholson	1562/1118					
Kevin McCall	1562/1116					
Brian McCall	1562/1108					
	1080/677	3	—	—	—	\$0.00
	1082/656	4	—	\$1.63	—	\$1.63
	1103/733	5	—	—	—	\$0.00
	1084/203	6	—	\$271.89	\$290.51	\$562.40
	1084/197	7	—	\$669.22	\$623.97	\$1,293.19
	99/7 ³	8	—	\$0.02	—	\$0.02
	143/291	9	—	\$3.07	\$2.75	\$5.82
		GRAND TOTAL:	\$0.00	\$1,015.32	\$990.83	\$2,006.15

³ Randall Corder does not have an interest in this lease.